Kansas Department of Health and Environment
Bureau of Waste Management
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MUD TRAP WASTES

Technical Guidance Document SW 94-03

Most car wash facilities in Kansas have mud traps at the point car wash water drains into sewer systems. The purpose of a mud trap is to settle out mud, sand and grit washed from cars so that it does not plug sewers. While petroleum-based products can also make their way into the traps, experience has shown that this material is generally inert and has minimal potential for negative health or environmental impact. Therefore, this material is considered a non-hazardous waste by definition and no analytical testing of this material is required prior to re-use or disposal.

Other businesses also have mud traps at their facilities. Most of the facilities are related to engine repair. Some of the types of facilities that utilize mud traps include auto repair shops, truck washes, radiator repair shops, agriculture equipment repair shops, service stations, and stationary engine repair shops. Due to the nature of the activity at these types of facilities, the waste in their mud traps often contains high concentrations of petroleum products and/or heavy metals. Analytical results have shown that some of these "muds" are classified as hazardous wastes due to the concentrations of petroleum products or heavy metals. Therefore, these muds must be addressed with more caution than car wash mud. A part of this precautionary care includes analytical testing to prove the mud is not a hazardous waste. The testing requirements will vary depending on the type of business served.

Regardless of the source of the mud, it must be dry enough to pass a paint filter test (EPA method SW-846/9095), and be a non-hazardous waste if it is to be disposed *in* a municipal solid waste landfill (MSWLF) subject to federal and state solid waste regulations. For our purposes, "wet material" refers to mud that does not pass the paint filter test, while "dry material" refers to mud that does pass the paint filter test.

The requirement for mud trap waste to pass the paint filter test has presented problems to many companies that remove and dispose the mud with vacuum trucks because vacuum truck operators *add* water to the mud traps in order to make the material more pumpable. As a result of this *process*, the mud typically fails the paint filter test, and is considered a bulk liquid. This material must be dried to make it acceptable for disposal in a MSWLF.

For companies using "dry" removal methods, such as shoveling or removal with a clam shell, the remaining mud usually passes the paint filter test, or will pass the paint filter test with minimal air drying. The solid material can then be landfilled.

An additional requirement for disposal in a MSWLF is a *disposal authorization* issued by KDHE. If the mud is non-hazardous it may be disposed of in a Kansas MSWLF with a disposal authorization from BWM's Permits Section. A disposal authorization is required to dispose special, non-domestic/non-commercial types of waste in a MSWLF. A disposal authorization can be obtained by calling (785) 296-1120 or 296-1600, or by writing BWM at the address on the top of this document. At the end of the address block, please add the following words:

ATTN: Disposal Authorization

The information required in the disposal authorization request includes the type and quantity of waste to be disposed, results of any laboratory analyses required by KDHE, and the MSWLF proposed for the disposal. Please note, however, the MSWLF operator at the proposed MSWLF has the option of accepting or refusing the mud regardless of KDHE's issuance of a disposal authorization.

The acceptable methods for disposal of muds are given in order of preference on the following page. Please note: 1) some of the methods may be suitable on a seasonal basis or may be temporary solutions until more permanent methods are developed, and 2) disposal at a transfer station is not acceptable.

Car Wash Facilities

A. Wet Material
   1. De-water and dispose as dry material
   2. Commercial processing facility
   3. Wastewater treatment plant
   4. Open MSWLF (surface applied on top of closed cell) with KDHE approval
   5. Closed MSWLF (surface applied on top of closed site) with KDHE approval
   6. Other KDHE -approved land application- on-site, pasture, fill area, co-disposal with wastewater treatment plant sludge, etc.

B. Dry Material
   1. Permitted MSWLF with a disposal authorization
   2. Permitted small arid landfill with a disposal authorization
   3. Closed MSWLF (surface applied on top of closed site) with KDHE approval
   4. Permitted construction/demolition landfill with KDHE approval
   5. Other KDHE-approved land application - on-site, pasture, fill area, co-disposal with wastewater treatment plant sludge, etc.

Repair/Industrial Facilities

A. Non-Hazardous Wet Material
   1. De-water and dispose as dry material
   2. Commercial processing facility
   3. Wastewater treatment plant
   4. Open MSWLF (surface applied on top of closed cell) with KDHE approval

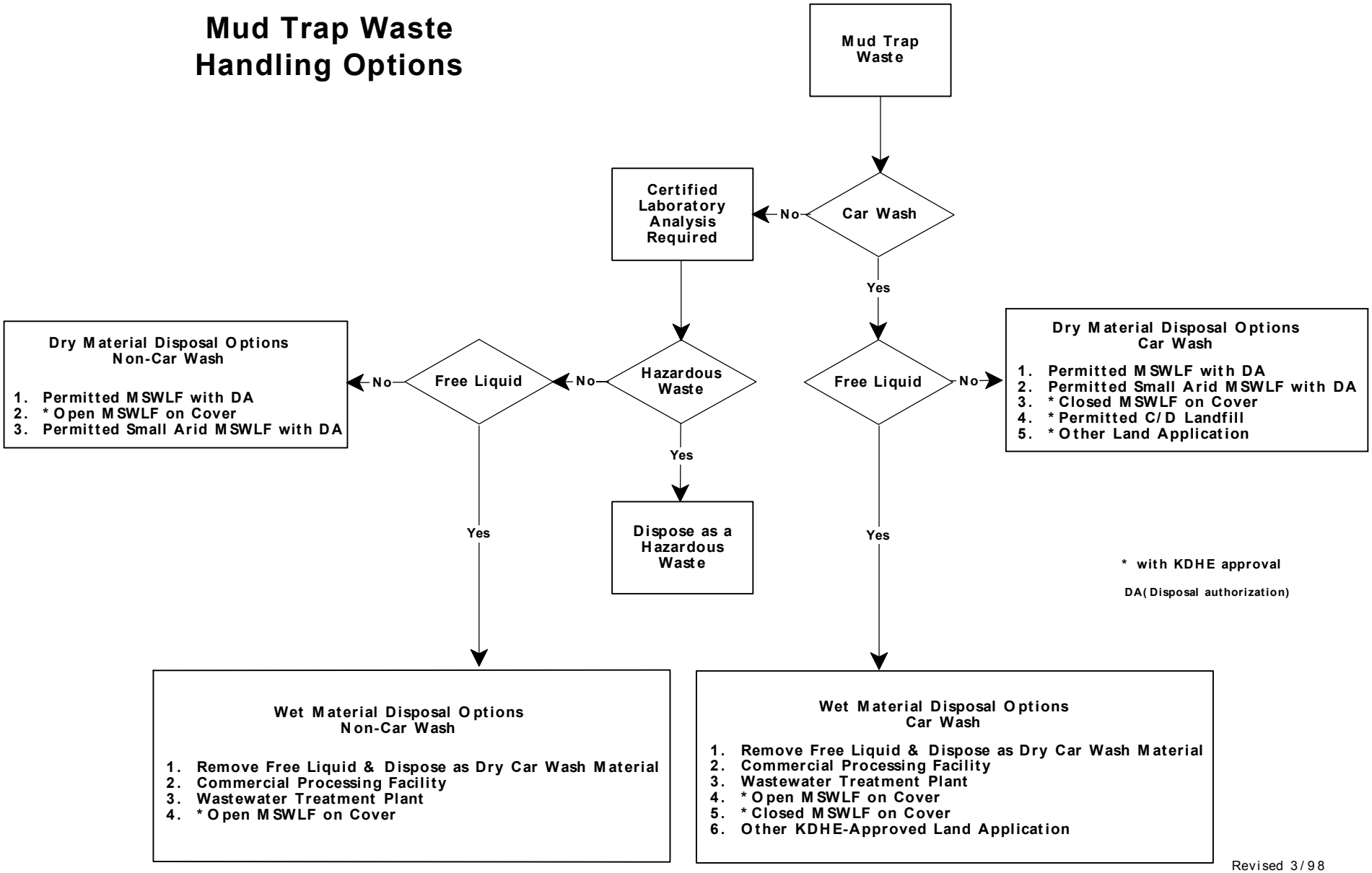
B. Non-Hazardous Dry Material
   1. Permitted MSWLF with a disposal authorization
   2. Open MSWLF (surface applied on top of closed cell) with KDHE approval
   3. Permitted small arid landfill with a disposal authorization

C. Hazardous Wet or Dry Material - ALL hazardous waste must be disposed in accordance with state rules and regulations addressing hazardous waste (K.A.R. 28-31-1 et. seq.)

A flow chart outlining options for handling mud trap waste is presented on the following page.

For additional information regarding proper management of solid or hazardous waste, you may contact the Bureau of Waste Management at (785)296-1600, or the address at the top of this document.

Mud Trap Waste Handling Options



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